

Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROY NAUGHTON,  
COLTER O'DELL, and GLEN BALDWIN

Defendants.

CASE NO. MJ21-512

COMPLAINT for VIOLATION

18 U.S.C. § 113(a)(4)

BEFORE the Honorable Mary Alice Theiler, United States Magistrate Judge,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**  
**(Assault by Striking, Beating, or Wounding)**

On or about January 11, 2021, within the Western District of Washington, the  
defendants, ROY NAUGHTON, COLTER O'DELL, and GLEN BALDWIN, inmates in  
the Sea-Tac Federal Detention Center, committed an assault within the territorial  
jurisdiction of the United States by striking, beating, or wounding another inmate, John  
Doe.

All in violation of Title 18, United States Code, Section 113(a)(4).

COMPLAINT-NAUGHTON, O'DELL, & BALDWIN - 1

UNITED STATES ATTORNEY  
700 STEWART ST., SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1  
2 The undersigned complainant being duly sworn further states:

3 **AFFIANT BACKGROUND**

4 1. I, Micheal Moore, am a Special Agent (“SA”) with the Federal Bureau of  
5 Investigation (“FBI”) and have been so employed since September, 2019. I am currently  
6 assigned to the civil rights and public corruption squad in the Seattle, Washington office.  
7 As a FBI Special Agent, I have been trained to investigate a variety of crimes, including  
8 cases involving assault and those in a federal penal institution, including detention  
9 centers. In this capacity, I investigate, *inter alia*, violations of Title 18, United States  
10 Code, Section 113 *et seq.*, and related offenses.

11 2. The statements contained in this affidavit are based upon my investigation  
12 and information provided to me by others familiar with this matter, including other law  
13 enforcement officers. I have not included each and every fact known to me or other  
14 investigative personnel concerning this investigation. I have set forth only the facts I  
15 believe are necessary to establish probable cause to believe that ROY NAUGHTON,  
16 COLTER O’DELL, and GLEN BALDWIN committed the crime of Assault by Striking,  
17 Beating, or Wounding in violation of Title 18, United States Code, Section 113(a)(4).

18 **SUMMARY OF PROBABLE CAUSE**

19 3. On or about January 11, 2021, inmates NAUGHTON, O’DELL, and  
20 BALDWIN assaulted inmate John Doe in the DC unit of the Sea-Tac Federal Detention  
21 Center (“FDC-SeaTac”). According to a FDC-SeaTac investigative report, inmate John  
22 Doe told investigators that NAUGHTON and O’DELL entered his cell and told him to  
23 “put in work,” referring to assaulting another inmate, or pay rent in the amount of fifteen  
24 dollars per week, to stay in the unit. When John Doe refused to comply with  
25 NAUGHTON and O’DELL’s demands, inmates NAUGHTON and O’DELL assaulted  
26 John Doe in his cell. John Doe further told FDC-SeaTac investigators that while he was  
27 being assaulted, NAUGHTON and O’DELL began yelling, “How do you like that, you  
28

1 fucking faggot?” Once the assault moved to the common area of the unit, inmate  
2 BALDWIN joined NAUGHTON and O’DELL in assaulting John Doe.

3 4. Institutional cameras were in place and recorded the assault on January 11,  
4 2021. FDC-SeaTac staff conducted an internal review of the institutional camera footage  
5 of the assault and identified inmate NAUGHTON and inmate O’DELL as the inmates  
6 who initiated the assault on John Doe. Inmate BALDWIN was also identified as another  
7 inmate who participated in the assault of John Doe. I have reviewed the FDC-SeaTac  
8 institutional camera recording of the assault, as well as photographs of inmates John Doe,  
9 NAUGHTON, O’DELL, and BALDWIN. My review of the video surveillance and  
10 photographs is consistent with the statements of John Doe and the FDC-SeaTac staff  
11 review of the surveillance footage.

12 5. On February 26, 2021, John Doe was interviewed by agents at FDC-  
13 SeaTac. John Doe’s attorney was present for the interview by phone. John Doe told  
14 agents that NAUGHTON, O’DELL, and BALDWIN approached him and told him that if  
15 he did not pay them fifteen dollars per week in rent and assault two other inmates, then  
16 they were going to beat the shit of him on Monday [January 11, 2021]. BALDWIN told  
17 John Doe, “We think you’re alright, but you can’t be gay in the unit. It’s not how it  
18 works.” John Doe further told agents that on January 11, 2021, NAUGHTON came into  
19 his cell, and John Doe told NAUGHTON that he was not going to pay NAUGHTON rent  
20 and said “fuck you” to NAUGHTON. NAUGHTON immediately threw a punch and hit  
21 John Doe in the face. John Doe told agents that he defended himself and hit  
22 NAUGHTON once or twice. John Doe told agents that he then pushed NAUGHTON  
23 back into the cell door which opened, and John Doe and NAUGHTON’s momentum  
24 carried them into the common area of the unit. John Doe managed to place NAUGHTON  
25 in a temporary headlock to prevent NAUGHTON from continuing to hit him. Inmates  
26 O’DELL and BALDWIN then joined the assault and began punching and kicking John  
27 Doe, such that he could no longer defend himself from inmates NAUGHTON, O’DELL,  
28 and BALDWIN’s attacks.

1           6.       On February 26, 2021, agents interviewed John Doe's cellmate, C.H..  
2 C.H.'s attorney was present for the interview by phone. C.H. stated that on January 11,  
3 2021, he observed NAUGHTON follow John Doe into the cell and shut the cell door  
4 behind him. C.H. looked through the cell door window and saw NAUGHTON throw a  
5 couple of punches at John Doe. C.H. began to back away from the cell as the cell door  
6 was thrown open. C.H. saw John Doe holding NAUGHTON in a head lock and then  
7 O'DELL and BALDWIN ran up to NAUGHTON. C.H. observed both O'DELL and  
8 BALDWIN begin hitting John Doe. C.H. then observed NAUGHTON, O'DELL, and  
9 BALDWIN kicking and punching John Doe while saying slurs, including, "You like that  
10 fag."

11           7.       I have reviewed documentation from the medical assessment of John Doe  
12 performed by FDC-SeaTac medical personnel after the assault on January 11, 2021. The  
13 documentation notes that John Doe had a superficial, non-bleeding cut on his right index  
14 finger, superficial and non-bleeding scratches on his forehead and redness to the  
15 back/nape of his neck. During John Doe's interview with agents, John Doe reported that  
16 after the assault he could not open his jaw fully, his face and head were swollen, he had a  
17 lump on his head, and he had a swollen elbow with a bump on his elbow. John Doe stated  
18 that he had swelling for about three weeks after the assault and that his elbow still hurt at  
19 the time of the interview. John Doe also believed his nose was broken as a result of the  
20 assault because he could feel the bone separated in his upper nose area, but that he had  
21 not been seen by medical staff for his nose. John Doe also reported pain in his collar  
22 bone, which he was still experiencing significant pain at the time of the interview.


23           8.       Members of the FDC-SeaTac staff interviewed inmates housed in the DC  
24 unit of FDC-SeaTac concerning their observations of the assault and behaviors  
25 demonstrated by NAUGHTON, O'DELL, and BALDWIN towards other inmates.

26           9.       The Sea-Tac Federal Detention Center is a federal detention center operated  
27 by the United States Bureau of Prisons located in Sea-Tac, Washington.

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**CONCLUSION**

9. Based on the above facts, I respectfully submit that there is probable cause to believe that ROY NAUGHTON, COLTER O'DELL, GLEN BALDWIN committed the crime of Assault by Striking, Beating or Wounding, in violation of Title 18, United States Code, Section 113(a)(4).

  
Micheal Moore, Complainant  
Special Agent, FBI

Based on the Complaint and Affidavit sworn to before me telephonically, the Court hereby finds that there is probable cause to believe the Defendants ROY NAUGHTON, COLTER O'DELL, and GLEN BALDWIN committed the crime of Assault by Striking, Beating or Wounding, in violation of Title 18, United States Code, Section 113(a)(4).

Dated this 13th day of September 2021.

  
Honorable Mary Alice Theiler  
United States Magistrate Judge